



CABLE & WIRELESS, INC.

COPY

Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna
Virginia 22182

Telephone: (703) 790-5300

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April 24, 1998

EX PARTE OR LATE FILED

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APR 24 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

RE: **EX PARTE**

CC Docket 92-237, In the Matter of Carrier Identification Codes

CC Docket 95-155, In the Matter of Toll Free Service Access Codes

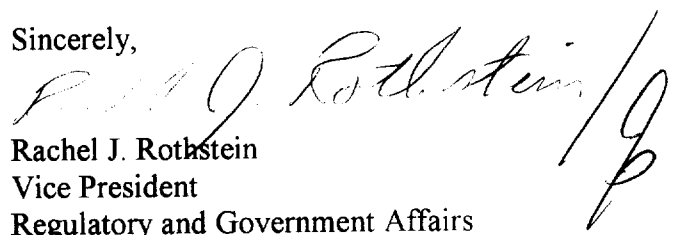
Dear Ms. Salas:

On April 24, 1998, James E. Petri and the undersigned, on behalf of Cable & Wireless, Inc. ("CWI"), met with Kris A. Monteith, Renee Alexander and David O. Ward of the Common Carrier Bureau's Network Services Division. We discussed CWI's efforts to update its network and educate its customers concerning the change in access code dialing patterns, and CWI's comments filed in CC Docket 92-237 on April 10, 1998. We presented the Commission staff copies of a customer mailing (Attachment A), which show the company marketing its product with the new dialing pattern.

As mentioned in the meeting, we are also providing the Commission with copies of material previously sent to CWI sales representatives and customers regarding the changing dialing pattern (see Attachments B, C, and D).

Additionally, there was a short discussion of carrier efforts to notify customers of 888 set-aside first refusal rights.

Sincerely,


Rachel J. Rothstein
Vice President
Regulatory and Government Affairs
Cable & Wireless, Inc.
703/734-4439

cc: Kris A. Monteith
Renee Alexander
David O. Ward

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Go ahead...

**...make
their day!**

When it comes to
long distance calling,
we really rate!

Now you can **SAVE UP TO 35%**
over AT&T, MCI or Sprint on long distance calls.
Just dial 10 10 566 + 1 + Area Code + Number
and you automatically start saving!

Call home and talk longer for less with

10 10 566

Call  Club
10 10 566

So join the Call Club! Start your savings on
long distance calling today! 10 10 566,
your key to long distance savings!

CW11C

*Interstate calls

Call home today & SAVE!

**Long distance for just
9¢/minute!***

Save money on all your long distance calls!

For 9¢ a minute, you can call any interstate number, anytime and know that you're saving money!

Just dial

10 10 566

+ 1 + Area Code + Number
and save up to 35% on long distance calls.
You'll see the savings right on your phone bill!



It's easy!

- No switching.
- No sign-up.
- No commitments.
- No restrictions.

Call Club
10 10 566

Here's how it's done:

Domestic: 10 10 566 + 1 + Area Code + Number

International: 10 10 566 + 011 + Country Code + Number

You'll see the savings right on your phone bill!

Here's how we rate:

Country	Call Club Rate
Canada	\$.15 per minute
France	\$.25 per minute
Germany	\$.20 per minute
Italy	\$.40 per minute
United Kingdom	\$.15 per minute

Long distance for just
9¢/minute!

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CW 110

Sales Bulletin



FCC Has Changed Dial-Around Codes. CWI's 10223 Is Now 1010223!



The FAST Facts:

- An FCC ruling is changing the 5 digit dial-around code to 7 digits.
- This change impacts any customer who uses the dial-around code for making IntraLATA or local calls on CWI, including autodialer, PBX and Partner Line customers.
- We are currently in a permissive dialing period where either format can be used, but as of January 1, 1998, only the 7 digit code will be valid.

■ What Is A Dial-Around Code?

The dial-around code, also known as the Carrier Access Code, is primarily used by customers who want to use a carrier other than their local phone company or presubscribed long distance carrier. Typically, it is used for routing calls, such as IntraLATA calls, over an alternative long distance carrier instead of the local phone company. The new dialing format is '101XXXX.' The 'XXXX' represents a 4 digit Carrier Identification Code (CIC) and is specific to each carrier. **The new CWI code is 1010223**

■ What Does This Change Mean To Our Customers?

This change will affect all customers who have customer premise equipment (CPE) such as autodialers and PBXs, as well as those who access CWI casually (such as Partner Line customers). **For customers with CPE, their PBXs or autodialers will need to be reprogrammed to use the expanded 7 digit code.** Since the new 7 digit format is currently available, any new CWI customers, as well as current Partner Line customers, should use the 7 digit code. Operations is currently using the 7 digit format for all new autodialer installs.

■ How Are CWI Customers Being Notified?

● General Notification

We are sending out a general notification to all customers in the summer and fall editions of the Inside Line customer newsletter. Bill inserts covering the new format will be sent out in the fall as a reminder.

● Existing Autodialer Customers

A list is currently being compiled of all 'known' dialer customers with CWI-installed autodialers. Operations will be reprogramming these dialers (at no charge) where IntraLATA Presubscription (ILP) is not available or where the customer has a defined need to continue using the the dialer, such as for routing local calls over CWI. We will be sending out more details on our plans for handling autodialer customers in the near future.

- **PBXs and Other CPE**

Customers with PBXs, Key Systems, Hybrid Systems or their own autodialers will need to contact their equipment vendor and arrange to have their system reprogrammed.

- **Partner Line Customers**

A list is currently being compiled of all Partner Line customers. Plans for notifying these customers will be released soon.

■ What Should You Do?

- Introduce ILP to your customers where it is available.

Ask your customers to look at their local phone bill to see if they are being billed for local long distance calls. Sell them on the benefits of presubscribing to CWI:

- Convenience—no additional codes to dial.
- Complete Cost Control—use the same accounting features to track all calls.
- Increased Cost Savings—include IntraLATA calls for volume discounts and usage minimums.
- Simplified Management—receive one easy-to-read invoice for long distance and IntraLATA calls.

- Call affected customers to make sure they understand what they need to do if they have autodialers, PBX's, etc.
- When talking to Partner Line customers, educate them about the new dialing format and encourage them to start using it now.



CABLE & WIRELESS, INC.

INSIDE WIRELINE

VOLUME 4 ■ SUMMER 1997

COMMUNICATIONS TOOLS AND TIPS FOR BUSINESSES

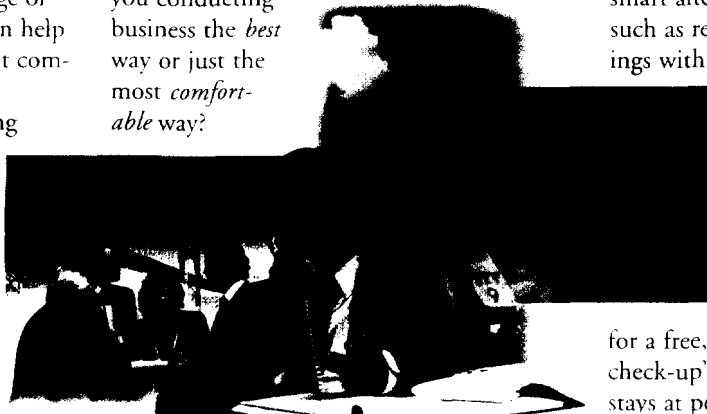
BUSINESS PRODUCTIVITY TIPS

Fine-Tune Your Communications for Peak Performance

Reduced budgets and rising costs are business realities. Taking full advantage of your telecommunications provider can help you manage scarce resources and meet competitive challenges.

How do you know if you are taking advantage of what your telecommunications provider offers? Begin with an objective inventory of your internal and external communications. Are you using communications services to make it easy for customers to reach you? Do traveling employees have the tools they need to stay in touch and be productive?

Examine your business processes. Are you conducting business the *best* way or just the most *comfortable* way?



The right communications services offer smart alternatives to traditional methods, such as replacing some face-to-face meetings with conference calls.

At Cable & Wireless, Inc. (CWI), we specialize in analyzing business needs and recommending communications solutions to improve productivity, increase revenue and manage expenses. Call your local CWI sales representative today

for a free, personalized "communications check-up" to help ensure that your business stays at peak performance.

Focus on Bottom-Line Results

Where your company is concerned, one size does not fit all. That's why Cable & Wireless offers flexible communications solutions that are easily tailored to your business.

Personal Office gives you long distance calling, plus the option of conference calling, speed dial, voice mail and fax mail, all in *one* calling card. Now you can be as productive on the road as in the office.

TIP Use *Personal Office* and account codes to track travel expenses including phone calls, conference calls and faxes through the CWI *Intelligent Bill*.

Toll-Free services aren't just for big companies. Studies show that 62 percent of consumers would rather do business with a company that offers a toll-free number. In fact, new customers are 3 to 4 times as likely to phone if the call is toll-free.

TIP Expand your service hours and build customer loyalty by taking advantage of the many routing options that are available, such as:

- *DayTimer* to redirect your toll-free calls to another location based on day of the week, time of day or both.
- *Programmable TollFree* for on-demand redirection of your toll-free calls anywhere in the world.
- *Overflow Manager* to send your toll-free calls automatically to an alternate location when your line is busy.

TIP Request the Incomplete Call report with your CWI *Intelligent Bill* to monitor busy or unanswered calls to your toll-free numbers. Use this information to assess busy service times and increase staff requirements.

For more ways you can put CWI services to work for you, call your local CWI sales representative or Customer Satisfaction at 1-800-486-8686.

Manage Your Business, Not Just Your Expenses

One of the most powerful management tools at your disposal comes to you every month from Cable & Wireless—your CWI *Intelligent Bill*. In one information-packed set of reports, you get details about all your calling, including international and regional, toll-free, calling card, fax and conference calls.

Your CWI *Intelligent Bill* lets you track employee activity, customer contacts and other business patterns. We make it easy to allocate communications costs with convenient accounting or security codes.

Take advantage of CWI's advanced billing system by designing your own invoice. Your CWI sales representative will review your bills and help you create a customized set of management reports. Or call CWI's Customer Satisfaction Center at 1-800-486-8686.

Take Charge of Your Regional Calling

Choose Cable & Wireless for your long distance *and* regional calling to maximize your efficiency and savings.

Regional toll calls go beyond your local calling area but are not considered long distance. They are also known as intraLATA (intra Local Access Transport Area), local long distance or in-state equal access calls. The FCC estimates that 10 percent of telecommunications expenses are for intraLATA calling. In the past, these calls were carried by your local telephone company, unless you used dialers or access codes before each call.

Now you may select the carrier you want for your intraLATA calls. You can "presubscribe" to CWI intraLATA service in 30 states across the country, letting you dial those same regional calls with Cable & Wireless without special equipment or access codes.

TIP To see if CWI is processing those calls already, look at your local phone bill. If any regional calls are on that bill, call your CWI sales representative to discuss how best to route those calls to CWI.

Choosing Cable & Wireless translates into substantial benefits:

- **Complete cost control.** Use the same accounting features for your regional and long distance calls to track all expenses.

- **Increased cost savings.** Include your regional calls in determining any volume discounts and usage minimums.

- **Simplified management.** Receive one easy-to-read bill for your regional *and* long distance calls.

- **Outstanding customer service.** Enjoy CWI's excellent customer service.

TIP To receive a faxed list of presubscription areas for CWI regional calling, call 1-888-CWI-4FAX (1-888-294-4329) and request document #316.

If regional presubscription is not yet available in your area, you can still choose Cable & Wireless to carry your regional calls. Simply dial "10223" prior to the area code and number.

NOTE: If you have already been using this calling method to reach CWI, you will need to begin dialing a *new* seven-digit number "1010223" beginning January 1, 1998. Until then, you have a choice of using the old five-digit number ("10223") or the new one. This is important if you have programmed an automatic dialer or your PBX.

To presubscribe to CWI, contact your local sales representative or call Customer Satisfaction at 1-800-486-8686. For more information about programming your equipment with 1010223, contact your local sales representative.

SERVICE UPDATE

Crossing the Borders With PASSPORT

It's an exciting year for Cable & Wireless *PASSPORT* service. Using your CWI calling card, you can now make calls to the U.S. from the following locations:

Antigua	Bahamas
Barbados	Bermuda
Cayman Islands	Jamaica
Mexico	St. Lucia
St. Vincent	

With these *new* additions, *PASSPORT* allows calling from more than 50 locations and to more than 200 international locations. Typically, *PASSPORT* service is more

economical than using foreign telephone companies or hotel operators for your overseas-to-U.S. calls, country-to-country calls and intra-country calls.

And now, calls from any *PASSPORT* originating country can terminate to any U.S. toll-free number. This allows you a convenient way to stay in touch with the office, contact clients, send voice messages and make travel arrangements.

To receive a faxed list of *PASSPORT* countries and their access numbers, call toll-free 1-888-294-4329 and request document #314.



CABLE & WIRELESS, INC.

8219 Leesburg Pike

Vienna, Virginia 22182

Customer Satisfaction: 1-800-486-8686

e-mail: customer.satisfaction@cwi.cablew.com

Web Site: <http://www.cwi.net>

To receive free information on CWI products and services instantly by fax, call toll-free 1-888-CWI-4FAX (1-888-294-4329) and follow the voice prompts.

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ASK THE EXPERT

Q: How do I utilize my telecommunications provider to my best advantage?

A: Periodically assess how your telecommunications company is helping you achieve your business objectives. Start by making sure your provider understands how you conduct business and your vision of the future. Then decide if your provider is giving you tools to manage your time, control budgets and support business growth.

- **Detailed billing** is a powerful management tool that can help track expenses and business activity. Are you using accounting or security codes? These allow you to allocate costs by customer, project, department or almost any parameter you choose.

- **Take advantage of intelligent routing with your toll-free (800/888) services**, such as time-of-day/day-of-week routing. Open business locations can take calls for others that have closed for the day, supporting "follow-the-sun" strategies (keeping your business "awake" by hopping time zones across the country or around the world). Calls can also be sent to your nearest business location based on the telephone number of the caller.

- **Conference calling** is a successful substitute in lieu of travel for many non-sales meetings. Conference calling provides tremendous savings in time and money. It can also encourage more frequent contact with customers in post-sale situations.

- **A robust calling card program** can do more than manage long distance expenses. It should also support fax, voice messaging and conference calling.

These capabilities are more important for businesses that are expanding internationally where travel expenses and time must be vigorously managed.

We invite you to send your questions to Ron Reeps, President of The Atlantic Group, an international telecommunications training and consulting firm. He can be reached at:

Phone: 703-444-2697

Fax: 703-444-9095

E-mail: AtlanticGroup@MSN.COM



CABLE & WIRELESS, INC.

INSIDE LINE

VOLUME 5 ■ WINTER 1997

COMMUNICATIONS TOOLS AND TIPS FOR BUSINESSES

Exceed Your Business Goals with Toll-Free Services

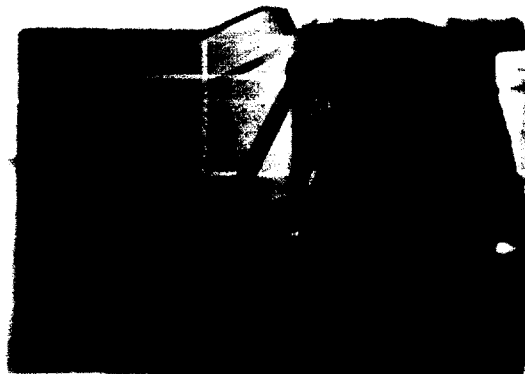
Are you satisfied with your company's performance this year? Will you meet your business goals? If there is room for improvement, consider how toll-free services from Cable & Wireless can help.

Cable & Wireless is a recognized innovator in the toll-free calling arena. By listening to our customers, we have continuously improved our toll-free offerings with enhancements such as *Programmable TollFree* and *Managed*

TollFree that give you virtually unlimited control over where and how your toll-free calls are answered.

If your focus is international, our toll-free services are a must. Callers around the globe can now reach you by calling one toll-free number.

Call your Cable & Wireless sales representative now for an analysis of how toll-free services can start helping you reach your business goals.



EASY TOLL-FREE

Select 1,2,3 Makes Re-Routing Toll-Free Calls Easy

Re-route your dedicated calls around the block or around the world just like you do your switched toll-free calls with this toll-free feature for dedicated lines. It's as easy as 1,2,3.

Select 1,2,3 for dedicated lines is flexible — you control the routing

of your toll-free calls at any time, from anywhere. Now, customers with dedicated lines can take advantage of the toll-free routing options previously available only to customers with switched lines through *Programmable TollFree*.

With *Select 1,2,3*, you no longer need

to worry about lost revenue from your toll-free numbers due to weather or other emergencies. From home, your East Coast office manager can route calls to the West Coast division

after a major snowstorm keeps operators from getting into work. This service is also excel-

lent for load balancing of toll-free traffic. If you have a call center that experiences peak capacity at 5:00 P.M., you can re-route calls so that your customer service representatives can catch up with order entries. And, because the service is within your control, you can route those calls back to your main location at any time.

Select 1,2,3 is available when you need it, day or night, to let you decide where and how your toll-free calls are answered. You can specify up to three predetermined numbers as routing options, including termination to regular business lines, dedicated access lines, and even international locations.

Select 1,2,3 is available with other Cable & Wireless toll-free features including *Account/Security Codes* and *Dialed Number Identification Service*.

For more information, contact your local Cable & Wireless sales office.





CLIP AND SAVE

Your PASSPORT to the World

Planning overseas travel? Be sure to take your Cable & Wireless *PASSPORT* Guide along. Here is the most current version, in a convenient "clip-and-save" format. It includes complete dialing instructions and our newest *PASSPORT* locations.

To use *PASSPORT* service, all you need is a Cable & Wireless calling card that has been activated (free of charge) for international access. Then the savings begin! With *PASSPORT* service, you will save time and typically cut down on costs compared to using foreign telephone companies

or hotel operators for your calls back to the U.S. or to other countries. Friendly Cable & Wireless operators are available 24 hours a day to make sure your calls go through.

PASSPORT country numbers change frequently, so it's a good idea to confirm the ones you need before you travel. You can do this via our web site (<http://www.cwi.net>), our Fax-on-Demand system at 1-888-294-4329 (document #314) or by calling Customer Satisfaction at 1-800-486-8686.

Fold A to A, B to B, C to C

PRODUCTIVITY TIPS

Give Your Business a Toll-Free Advantage

Use toll-free services from Cable & Wireless to give all areas of your company a business boost. **Increase sales.** Use a toll-free number in your advertising to increase the orders you receive, particularly among credit card holders who also tend to spend more than other customers. **Improve customer service.** Offer a toll-free number to make it easy for customers to call you. With Cable & Wireless' *Overflow Manager*, you can send calls that are unanswered to up to two alternate locations to ensure a response. Customer loyalty will increase — and so will your profits. **Improve communications.** Even if your customers and suppliers are local, give them your toll-free number to make it convenient to reach you when they travel.

Reduce expenses. Ask traveling employees to use your toll-free number instead of placing expensive collect calls when they phone back to the office.

TIP Use *Security Codes* with toll-free to help prevent unauthorized usage.

TIP Save on international calls back to your office in the U.S. *PASSPORT* calls can terminate to any U.S. toll-free number.

Expand into new markets. Advertise a toll-free number in new areas to test the market without a risky cash investment. Track customer response with Cable & Wireless' *Management Reports*.

Leverage valuable resources. Use Cable & Wireless' free *DayTimer* service to redirect calls based on parameters you choose (such as time of day or day of week).

REMINDER

New Number, Please

If you have been dialing "10223" before the area code to reach Cable & Wireless for your regional calls, you will need to use our new seven-digit number ("1010223") beginning July 1, 1998. Until then, you can use either the old five-digit

number or the new one, but remember to update the programming on your automatic dialer or PBX with the seven-digit number before July 1. For help on programming your equipment with 1010223, contact your local Cable & Wireless sales office.

When business takes you overseas, use Cable & Wireless *PASSPORT* service and your calling card to stay in touch with the U.S. and the world.*

Whether you're calling back to the U.S. or to another country, simply dial the special toll-free number for the country in which you're traveling (see eligible country listing inside). Within seconds, friendly Cable & Wireless operator will assist you.

PASSPORT service is a convenient, economical alternative to using foreign telephone companies and hotel operators for:

- Overseas-to-U.S. calls
- Country-to-country calls
- Intra-country calls

How to make a Cable & Wireless *PASSPORT* Call:

1. Dial the toll-free number on the inside of the guide for the country from which you are calling.

2. You will be connected with a Cable & Wireless operator.

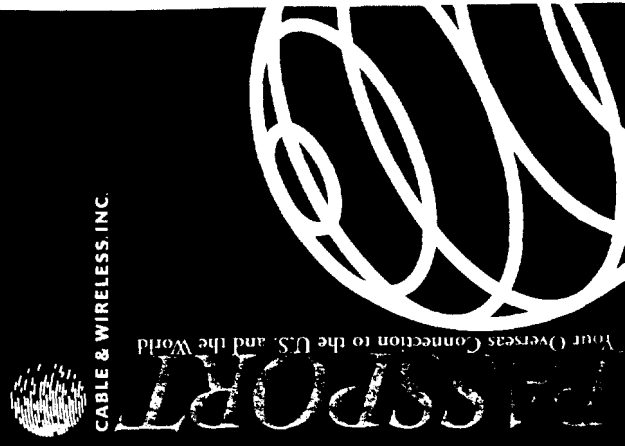
3. Travel Card Users/Personal Office Rotary Phone Users: Give the Cable & Wireless operator the following information:

- Toll-free access number
- Authorization code
- Number you want to reach (country code, area code, local number) or speed dial number
- Account/security code (if applicable)
- The operator will complete your call.

Personal Office Touch-Tone Users

Give the Cable & Wireless operator your toll-free access number. The operator will connect you to Personal Office.

* To use Cable & Wireless *PASSPORT* service, your calling card must be activated for international access (available at no cost). Call 1-800-486-8686.



24-Hour Customer Support

To ensure your service is smooth and trouble-free, Cable & Wireless *PASSPORT* operators are available to assist you 24 hours a day, 7 days a week. In the United States, Cable & Wireless Customer Satisfaction is available at

1-800-486-8686

Cable & Wireless, Inc.

8219 Leesburg Pike
Vienna, VA 22182

<http://www.cwi.net>

Customer Satisfaction: 1-800-486-8686

Fax-on-Demand: 1-888-294-4329

request document #314

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